

## UNITED STATES DISTRICT COURT

for the  
Southern District of West Virginia

FILED

JUL 10 2018

RORY L. PERRY II, CLERK  
U.S. District Court  
Southern District of West Virginia

## In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*U.S. Postal Service Priority Mail Package tracking number  
"9505514508118187185457" with a return address of "Cleo Watkins, 14041  
McClure Ave, Apt 2, Paramount, CA 90723-6014" and a delivery address of  
"Chyna Watkins, 428 23rd St, Dunbar, WV 25064"

Case No. 2:18-mj-00064

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

U.S. Postal Service Priority Mail Package bearing tracking number "9505514508118187185457" with a return address of "Cleo Watkins, 14041 McClure Ave, Apt 2, Paramount, CA 90723-6014" and a delivery address of "Chyna Watkins, 428 23rd St, Dunbar, WV, 25064" presently located at the Charleston WV Post Office

located in the Southern District of West Virginia, there is now concealed *(identify the person or describe the property to be seized)*:

U.S. Postal Service Priority Mail Package bearing tracking number "9505514508118187185457" with a return address of "Cleo Watkins, 14041 McClure Ave, Apt 2, Paramount, CA 90723-6014" and a delivery address of "Chyna Watkins, 428 23rd St, Dunbar, WV, 25064" and its contents, including, but not limited to controlled substances and evidence of a violation of 21 U.S.C. 841(a)(1) and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
21 USC 841(a)(1) and 846

*Offense Description*  
Distribution of a Controlled Substance and Conspiracy to Distribute a Controlled Substance

The application is based on these facts:  
See Attached Affidavit.

- ☒ Continued on the attached sheet.  
☐ Delayed notice of        days (give exact ending date if more than 30 days:       ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

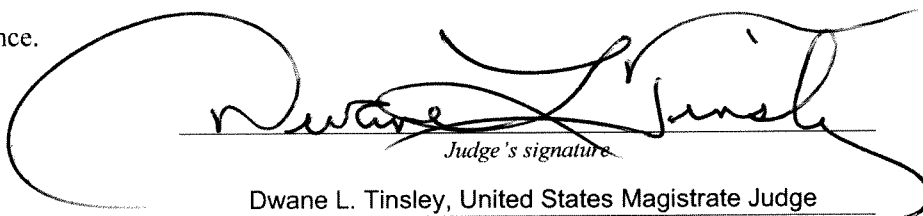
*Applicant's signature*

Joshua D. Mehall, United States Postal Inspector

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 07/09/2018

*Judge's signature*

City and state: Charleston, West Virginia

Dwane L. Tinsley, United States Magistrate Judge

*Printed name and title*

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to-wit:

I, Joshua D. Mehall, being duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector employed with the United States Postal Inspection Service since February 2007. My responsibilities include the investigation of crimes involving the U.S. Postal Service and crimes furthered through the use of the U.S. Mail. This includes the investigation of controlled substances sent through the U.S. Mail.

2. This affidavit is made in support of an application for a search warrant to search the contents of a U.S. Postal Service Priority Mail Package bearing tracking number "9505514508118187185457" with a return address of "Cleo Watkins, 14041 McClure Ave, Apt 2, Paramount, CA 90723-6014" and a delivery address of "Chyna Watkins, 428 23<sup>rd</sup> St, Dunbar, WV, 25064" (hereinafter referred to as the "SUBJECT PARCEL #2"). An additional search warrant is being sought for a separate package, hereinafter referred to as the SUBJECT PARCEL #1, as outlined in paragraphs 12-15. The SUBJECT PARCEL #2 is a Priority Mail Large Flat Rate Box with a partially handwritten address. SUBJECT PARCEL #2 was mailed on July 6, 2018 from Downey, California with \$13.65 postage

affixed. The SUBJECT PARCEL #2 is presently located at 1002 Lee St., Charleston, WV 25325.

3. The information contained in this affidavit is based on information I have gained from my investigation, my personal observations, my training and experience, and information related to me by other law enforcement agents and witnesses.

4. Drug trafficking background gained over the years has shown that drug dealers and drug traffickers utilize the U.S. Postal Service for shipping controlled substances, including but not limited to cocaine, heroin, methamphetamine, marijuana, and pharmaceuticals. The use of Express Mail, Priority Mail and First Class Mail are favored because of the reliability, anonymity, speed (overnight service), minimal cost, and ability to track the mail piece.

5. Through experience gained in drug investigations by Postal Inspectors and other law enforcement agents, and through information provided by individuals who have been involved in buying, selling, and shipping drugs by Express Mail, Priority Mail and other types of shipments, the Postal Inspection Service has established a drug profile policy to screen mail packages for controlled substances. The profile characteristics include peculiarities in labeling and unusual packaging techniques as well as other considerations. The reason that handwritten labels are of interest is that the vast majority of premium mail services

such as Express and Priority Mail involves business-to-business or business-to-person correspondence and features typewritten or computer-generated labels. Person-to-person correspondence (and the handwritten labels attendant thereto) accounts for a very small minority of total Express and Priority Mail traffic.

6. Postal Inspectors, Special Agents of the Drug Enforcement Administration (DEA) and other intelligence sources have identified Arizona, Texas, California, Florida, Michigan, New Jersey and New York as major source states for illegal drugs flowing into areas within the Southern District of West Virginia.

7. From my experience, training, and knowledge of drug shipments through the U.S. Mail I am aware that drug traffickers frequently use fictitious names and addresses on the return address portion of the mailing label both to remain anonymous and avoid detection. Some return addresses have been found to be legitimate addresses, but the actual resident at those locations is either fictitious or non-existent. I am also aware that the address of the person that the mail piece is addressed to is generally not fictitious because a valid address is necessary for the package to be delivered. However, at times the true name of the addressee may be altered or ignored in favor of an alias or code name to better disguise their identity from law enforcement.

8. Based upon my knowledge, training, and experience I know that drug traffickers using the U.S. Postal Service often use

unusual packaging techniques. These may include excessive taping or wrapping or by including within the package items having strong odors in an effort to contain or mask the odor of controlled substances in order to avoid detection by trained narcotics dogs.

9. Your affiant knows based on training and experience as well as consultation with other agents, that U.S. Mail is often used by narcotic traffickers to transport controlled substances, as well as U.S. currency derived from the distribution of controlled substances, either as payment or proceeds. Your affiant knows based on training and experience that U.S. Postal Service Express Mail is commonly used to transport controlled substances because narcotic traffickers can track the parcels, and control dispatch times and locations.

#### **BACKGROUND OF INVESTIGATION**

10. For a number of months, your affiant has been involved in multiple investigations in which methamphetamine is being trafficked from Los Angeles, California and surrounding cities into the Dunbar, West Virginia area through the US Mail. During the course of these investigations, your affiant had occasion to review USPS electronic records, and identified 428 23<sup>rd</sup> St, Dunbar, West Virginia as an address that had received a significant number of packages from California fitting size, weight and shipping methods consistent with drug packages. To wit, your affiant found approximately fourteen (14) packages mailed to the referenced

address from cities around the Los Angeles, California area from December 26, 2017 through June 23, 2018. Based on my training and experience, your affiant is aware that this frequency of packages from a non-business address to a non-business address is often indicative of drug trafficking.

11. As a result of the electronic record review, your affiant placed an electronic Mail Watch on 428 23<sup>rd</sup> St, Dunbar, West Virginia looking for packages coming from California.

12. On July 9, 2018, your affiant was notified of two (2) packages, including the SUBJECT PARCEL #2, matching the profile set up in the electronic Mail Watch. Your affiant proceeded to the Dunbar, West Virginia Post Office, and located and reviewed both packages. Among other characteristics, your affiant noted the SUBJECT PARCEL #2 was excessively taped, and was being sent from California, a known source state for illegal drugs coming into the Southern District of West Virginia. Your affiant further observed that both packages were mailed at the same time and had the same sender name and address.

13. Upon examining the SUBJECT PARCEL #1, your affiant noted a menthol or eucalyptus-like odor, consistent with Vick's Vaporub. Based on my training and experience, your affiant is aware the drug dealers often use similar substances in order to mask the odor of the illegal drugs in an attempt to avoid detection by law enforcement.

14. Officer Lindell, Charleston Police Department, provided a trained narcotic detection dog named "IKAR". IKAR has experience with narcotics investigations including drug parcels and was last certified in April 2018.<sup>1</sup>

15. On July 9, 2018 the SUBJECT PARCEL #1 was placed in a line-up with three additional boxes of various shapes and sizes. IKAR conducted an exterior examination of all the parcels. Officer Lindell informed me that IKAR positively alerted on the SUBJECT PARCEL #1 indicating the presence of the odor of a controlled substance. Subsequent to the positive alert, your affiant placed SUBJECT PARCEL #2 in a separate line-up in a separate location with three additional boxes of various shapes and sizes. IKAR conducted an exterior examination of all the parcels. Officer Lindell informed me that IKAR positively alerted on the SUBJECT PARCEL #2 indicating the presence of the odor of a controlled substance.

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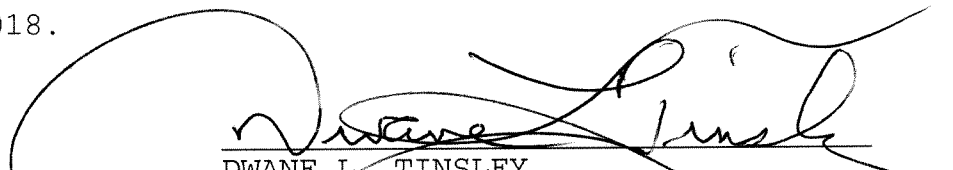
<sup>1</sup>Narcotics dogs trained using heroin are also able to detect the odor of other opiate based substances such as oxycodone, oxymorphone, hydrocodone, morphine, and the like. Because these substances are all derived from the poppy plant, they share a molecular foundation recognizable to the dog. Many trainers and certifying entities such as the West Virginia Police Canine Association believe that training and certifying a dog on pure heroin results in a more reliable dog. This is because it makes certain that the dog is trained to locate the odor of the foundational molecule and not some other non-controlled substance such as an agent used to "cut" heroin or bonding agents such as gluten used in the manufacturing of pharmaceuticals.

16. Based on the information contained herein, your affiant maintains there is probable cause to believe that the SUBJECT PARCEL #2 - U.S. Postal Service Priority Mail Package "9505514508118187185457" - contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846.

Further your affiant sayeth naught.

  
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JOSHUA D. MEHALL  
POSTAL INSPECTOR

Sworn to before me, and subscribed in my presence, this 9th  
Day of July, 2018.

  
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DWANE L. TINSLEY  
UNITED STATES MAGISTRATE JUDGE